

PRIVACY POLICY

USER INFORMATION

This Privacy Policy describes how ORBINOX (hereinafter referred to as "we" or "the Controller") processes users' personal data. At ORBINOX, we respect your privacy and are committed to transparency in the processing of personal information, whether you are a regular customer or simply browsing our website.

For this reason, we have adopted a high standard of data protection, aligned with the principles set out in Regulation (EU) 2016/679 of April 27 (General Data Protection Regulation, GDPR).

We strongly recommend that you read this Privacy Policy carefully to understand how we collect, use, and protect your personal data.

Who is responsible for processing your personal data?

ORBINOX VALVES INTERNATIONAL S.L. is the data controller responsible for the processing of your personal data. Please be informed that this data will be processed in accordance with the provisions of Regulation (EU) 2016/679 of April 27 (GDPR), and any other applicable regulations.

Why do we process your personal data?

At ORBINOX, we process your personal data primarily to maintain a business relationship with you. The operations carried out with your data are based on legitimate purposes and, generally, on one or more of the following legal bases:

- Contractual necessity: when the use of your data is essential for the execution of a contract we have with you.
- Legal obligation: if the processing is necessary to comply with a legal requirement to which we are subject.
- Legitimate interest: when the use of your data is based on our own or a third party's legitimate interest, and such use is not considered detrimental to you. As a general rule, our legal basis for using the personal data of client and supplier contacts is based on balancing our legitimate interests in business relationships with your right to personal data protection. We believe this does not harm you as a data subject, as we only record basic contact information related to the organization you work for, and we use this information to provide a service to you and your organization.
- Your consent: if you have given us your explicit consent for a specific use of your data.

In more detail, we use your personal data for the following purposes:

- To provide you with the products, services, and information you request.
- To send you marketing and advertising communications: this may include newsletters, surveys, and other promotional materials. These communications may be sent by email, fax, SMS, MMS, social media, or any other current or future electronic or physical means. It is important to note that these communications will be sent directly by us and will relate to our products and services, or those of our partners and suppliers with whom we have promotional agreements. We assure you that under no circumstances will third parties have access to your personal data for these purposes.



- To manage our business relationships, including negotiating and executing agreements.
- To conduct market research and statistical analysis, including obtaining insights into how our various services (websites, applications, and products) are used for evaluation and continuous improvement.
- To manage your orders, requests, and inquiries: we will respond to any request you submit through the contact forms on our website.
- To involve you in recruitment processes, analyzing the applicant's profile to select the best candidate for the vacancy.
- To provide general customer service and support.
- To communicate with you about various matters.
- To manage your website browsing, in accordance with our Cookie Policy.
- To comply with any applicable legislation.
- To fulfill the specific purposes of each form: your data will be used for the purposes and on the legal basis clearly specified on each form where personal data is collected on our website.

Why are we allowed to process your personal data?

We are allowed to process your personal data under Article 6 of the GDPR, which legitimizes processing in the following ways:

- With your consent: this specifically applies when you grant us permission to send you marketing communications and our newsletter. By subscribing, you give us your explicit consent.
- Contractual necessity: we may also process your data when necessary to perform a contract to which you are a party, or to take pre-contractual steps at your request. This means that if you start a business relationship with us or request something requiring an agreement, we will use your data to fulfill our and your obligations within that framework.
- Legal obligation: we may process your data when necessary to comply with a legal obligation applicable to us as data controllers.
- Legitimate interest: we may also process your data based on our legitimate interest. This allows us, for example, to conduct market studies and statistical analysis, as well as process orders and requests you submit.

How long will we retain your personal data?

Your personal data will be retained only for as long as strictly necessary for the purpose for which it was collected, or for as long as legal obligations require its storage. Once the data is no longer needed for these purposes, it will be deleted using appropriate security measures. This will ensure either the complete anonymization of the data or its total destruction.

To whom do we disclose your personal data?

In principle, we do not plan to share your personal data with third parties. However, if necessary for the proper execution of the stated purposes, we may share your data with our service providers. In any case, any communication or transfer of your personal data to recipients (whether individuals, legal entities, public authorities, agencies, or others) is kept to a minimum and subject to an adequate level of data protection. We have signed the required confidentiality and data processing agreements with these providers, as mandated by current privacy laws.



We may disclose your personal data to recipients in the following circumstances:

- Service providers: if essential for the correct execution of the processing purposes, we may share your data with our service providers. These may include hosting, cloud storage, IT support, marketing, administrative, or training services.
- Fulfillment of client obligations: to meet our obligation to deliver goods to you as a customer, including the provision of relevant information to our subcontractors and companies within our group.

Additionally, we inform you that, for the same purpose, some companies that provide services to the Controller may access your personal data. This may involve international data transfers. These transfers are only made to countries that ensure an adequate level of protection, equivalent to that of the European Union. This is ensured through European Commission adequacy decisions, standard contractual clauses, or approved certification mechanisms.

What are your rights?

As a user, you have several rights regarding your personal data:

- Right to withdraw consent at any time: you may revoke the permission you have granted us to process your data at any time.
- Right to access, rectification, portability, and erasure of your data: you may request a copy of your personal data, request that any inaccuracies be corrected, request that your data be transferred to another provider, or request its deletion.
- Right to restrict or object to processing: you may request that we limit how we use your data or object to its processing in certain circumstances.
- Right to lodge a complaint: if you believe your data is not being processed in accordance with the law, you may lodge a complaint with the relevant supervisory authority (www.aepd.es).

How can you exercise your rights?

To exercise any of these rights, you can contact us using the following information:

ORBINOX VALVES INTERNATIONAL S.L. (Headquarters)

Pol. Ind. Anoeta, S/N - 20270 Anoeta (Gipuzkoa)

Email: ovi@orbinox.com

MANDATORY OR VOLUNTARY NATURE OF THE INFORMATION PROVIDED

By ticking the relevant boxes and completing the fields marked with an asterisk (*) on our contact or download forms, you are explicitly, freely, and unequivocally consenting to our need for this information to process your request. All other fields are optional.

You guarantee that the personal data you provide is truthful and are responsible for informing us of any changes.

Please note that all data requested through our website is mandatory. It is essential for us to offer you optimal service. If you do not provide all the required information, we cannot guarantee that the information and services we provide will fully meet your needs.



SECURITY MEASURES

We want you to know that, in compliance with current regulations on personal data protection, we are committed to all provisions of the GDPR in the processing of your personal data. This means we process it lawfully, fairly, and transparently, and always in a manner that is appropriate, relevant, and limited to what is necessary for the purposes for which it was collected.

We guarantee that we have implemented appropriate technical and organizational policies to apply the security measures required by the GDPR and other applicable regulations. Our main objective is to protect your rights and freedoms. We have also provided you with the necessary information to fully exercise these rights.

If you would like more information about our privacy safeguards, please contact us at the following email: ovi@orbinox.com

LINKS TO OTHER WEBSITES

Our websites may contain links to other sites or host integrated content. Please note that we are not responsible for the content of third-party websites or their data collection practices.

When visiting third-party websites, we strongly encourage you to read the data protection and other relevant policies of those websites.

CHANGES TO OUR PRIVACY POLICY

We may update our Privacy and Cookie Policy from time to time. The most recent version will apply to your continued use of our website and to how we process your personal data. We suggest you review our Privacy and Cookie Policy regularly to stay informed.